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Presentment Date: June 28, 2013

Time: 12:00 p.m.

Objections Due: June 28, 2013

Time: 11:00 a.m.

*Attorneys for Irving H. Picard, Esq.,
Trustee for the Substantively Consolidated
SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L.
Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-1789 (BRL)

SIPA Liquidation
(Substantively Consolidated)

**NOTICE OF PRESENTMENT OF MOTION FOR AN ORDER PURSUANT TO
SECTION 78fff(a) OF THE SECURITIES INVESTOR PROTECTION ACT AND
SECTIONS 363 AND 105(a) OF THE BANKRUPTCY CODE AUTHORIZING THE
SALE OF ESTATE PROPERTY**

PLEASE TAKE NOTICE that, pursuant to Sections 363 and 105(a) of the United States
Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.* and section 78fff(a) of the Securities Protection

Investor Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), Irving H. Picard, trustee (the “Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under SIPA and Bernard L. Madoff, through his undersigned counsel, will present the attached proposed order (the “Order”) to the Honorable Burton R. Lifland, United States Bankruptcy Judge, for signature and entry on **June 28, 2013, at 12:00 p.m.**

PLEASE TAKE FURTHER NOTICE that objections, if any, to the proposed Order (“Objections”), shall (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rules and General Orders; (iii) specify the name of the objecting party and state with specificity the basis of the Objection(s) and the specific grounds therefor; (iv) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with a proof of service, and a courtesy copy delivered to the Chambers of the Honorable Burton R. Lifland, One Bowling Green New York, New York 10004; and (v) be served upon (a) Baker & Hostetler LLP, Counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David Sheehan and Amy Vanderwal, and (b) the Securities Investor Protection Corporation, 805 Fifteenth Street, NW, Suite 800, Washington, DC 20005, Attn: Kevin H. Bell, Esq., so as to be received no later than **11:00 a.m. on June 28, 2013.**

PLEASE TAKE FURTHER NOTICE that in the event any Objections are timely served and filed, a hearing may be held before the Honorable Burton R. Lifland, United States Bankruptcy Judge, at a date to be scheduled by the Court, upon such additional notice as the Court may direct. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE that unless Objections are timely served and filed, the proposed Order may be signed without a hearing.

Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

Dated: New York, New York
June 21, 2013

By: /s/ Amy Vanderwal
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